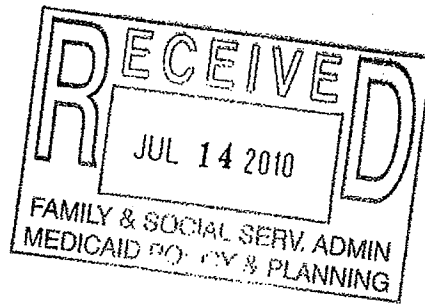


June 30, 2010



Indiana Economic Development Corporation

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Patricia Casanova  
Director of Medicaid  
Indiana Family and Social Services Administration  
402 W. Washington Street  
Indianapolis, IN 46204

Dear Ms. Casanova:

Pursuant to IC 4-22-2-28, the Indiana Economic Development Corporation ("IEDC") has reviewed the economic impact analysis for small business associated with rule changes contained in LSA Document 10-183 and proposed by the Indiana Family and Social Services Administration ("FSSA"). The proposed rule amends 405 IAC 1-14.6 and 405 IAC 1-15 to comport with federal requirements (42 CFR Part 483) implementing version 3.0 of the Minimum Data Set ("MDS"), effective October 1, 2010. The proposed rule requires that facilities report Special Care Unit ("SCU") information that is not captured by new federal requirements. This SCU information is used in the Medicaid case mix reimbursement system, which makes collecting the information necessary.

The economic impact statement prepared by the FSSA indicates that five nursing facilities meet the criteria for the definition of a small business and have an SCU. FSSA estimates that the annual administrative cost for each these five facilities to comply with the proposed rule would be less than \$200 since this data is readily available. The proposed rule also increases the percentage that the administrative reimbursement component is reduced due to unsupported resident assessment to provide a stronger incentive for facilities to meet minimum MDS requirements.

The IEDC does not object to the economic impact to small businesses associated with the proposed rule. If you have any questions about the comments contained herein please contact me at 232-8962 or [rasberry@iedc.in.gov](mailto:rasberry@iedc.in.gov).

Regards,

Ryan Asberry  
Assistant Vice President